

Re: Calvin Camps, Rose, MQ1920

S.C.I. Chester
500 East 4th Street
Chester, Pa 19013

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

Calvin Camps,
Plaintiff

NO: 14-1498

TWY FIFTY DEMAND

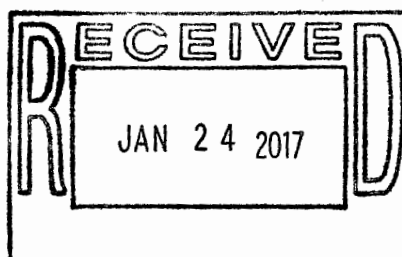
V.
City of Philadelphia, et al
Mayor Michael Nutter,
Louie Blum, Commissioner,
John Delaney, Warden
Defendants

FILED

JAN 24 2017

KATE BARKMAN, Clerk
By _____ Dep. Clerk

MOTION FOR AN ORDER COMPELLING DISCOVERY
Now Comes, Plaintiff, Calvin Camps, moves this
Court for an order, pursuant to Rule 33, 34,
37(a) of the Federal Rules of Civil Procedure
COMPELLING DEFENDANTS AND THEIR ATTORNEYS
OF RECORD, listed who failed to answer
INTERROGATORIES, REQUEST FOR PRODUCTION OF DOCUMENTS,
Copies of which are attached hereto.



(2)

Plaintiff, Cywin Camps, submitted These Requests
INTERD ~~Camps~~ PRODUCTION OF DOCUMENTS,
PURSUANT TO Rule 33, 34, of the Federal
Rules of civil Procedure, on date of April,
11, 20, 2016 and June 30, 2016, but have
NOT yet Received The Answers.

Plaintiff, Cywin Camps, move This Court
For an ORDER, PURSUANT TO Rule 37(c)
OF THE FEDERAL Rules of civil Procedure
COMPELLING DEFENDANTS TO Produce For
INSPECTION and copying The following
DOCUMENTS:

Plaintiff Cywin Camps submitted a number
of written requests for those documents,
PURSUANT TO Rule 34 of the Federal Rules
of civil Procedure on dates, April, 11, 20,
2016 and June 30, 2016, But have not yet
Received The Documents,

(3)

Plaintiff Cywin Camps, also moves for an order, pursuant to Rules, 26(b)(1), 37(a)(4) REQUIRING, the aforesaid DEFENDANTS TO PAY, Plaintiff The sum of \$250.00 an HOURS, ONE HOUR, as Reasonable Expenses IN obtaining this order, on the grounds THAT the DEFENDANTS, refusal to answer REQUESTS, INTERROGATORIES & Production of DOCUMENTS had no substantial Justification. SANCTIONS:

- a) To compel a Discovery Response, Disclosure
- b) To compel a Discovery Response
 - (i) a deponent fails to answer a Question asked under Rule 30 or 31
 - (ii) a Party fails to (Produce documents) and answer an Interrogatory submitted under Rule 33; OR

Dated: January, 19, 2017

X Cal Camps, Rose
 Cywin Camps, Rose
 MD 1920
 S.C.I. Chester
 500 Eps / 4th Street
 Chester, Pa 19013

Re: Calvin Camps, Pro se #483950

C.F. K.F.

June, 30, 2016

7901 STATE ROAD

PHILADELPHIA, PA 19136

Re: Plaintiff's REQUEST FOR PRODUCTION
OF DOCUMENTS UNDER RULE 34

DATED: April 11, 2016

Calvin Camps vs. Mayor Michael Nutter, et al
CV-14-1498

Dear Ms. REBECCA PROSPER, Esq.

I am sending this letter, on my issuer of
Outstanding Discovery Requests made to the
City of Philadelphia Legal Department and
Dimitrios Maveoudis, Esq. on the date of
April 11, 2016, Plaintiff's REQUEST FOR PRODUCTION
OF DOCUMENTS TO DEFENDANTS, UNDER RULE 34
was mailed to your office from Chester County
Prison, where I was at that time, Ms. PROSPER.
On April 20, 2016 The Plaintiff's First Set of
Interrogatories To Defendant, Commissioner
Louis Brizola, was mailed April, 22, 2016

(2)

I am waiting for my outstanding discovery
REQUESTS, TO DEFENDANTS, MS. PROSPER.
If there is anykind of problems, with
those timely served Discovery Requests
made under the Rules of civil Procedures
under Calvin Camps vs. Mayor Michael Nutter,
et al. CIV. NO.: 14-1498, Please send those
Requests within Ten (10) days, MS.
Prosper, if there is anykind of Problems
let me know.

yours Truly

~~Calvin Camps, POSE. #483950~~
Calvin Camps, POSE. #483950

CERTIFICATE OF SERVICE

I, Calvin Camps, hereby certify that on the date below, the foregoing letter was served on Defendants ATTORNEYS of Record, as to filed Discovery Requests Made on the following dates, April 11, 2016 Plaintiff's REQUEST FOR PRODUCTION OF DOCUMENTS, April 20, 2016 The Plaintiff's First Set of Interrogatories, Commissioner Louis Girola, on filed requests made this date of June 30, 2016, my request was given to prison officials at C.F.C.F., 7901 State Road, Philadelphia Pa 19136 SERVED:

REBECCA PROSPER, Assistant City Solicitor
CIVIL RIGHTS UNIT 14th Floor
LAW DEPARTMENT

ONE PARKWAY, 1515 ARCH. ST
PHILADELPHIA, Pa 19102-1595

Calvin Camps
Calvin Camps, Rose
#483910

CERTIFICATION OF SERVICE

I, Calvin Camps, hereby certify that a true and correct copy of the Plaintiff's Motion for an Order Compelling Discovery, was given to prison officials at S.C.I. Chester 500 East, 4th Street, Chester Pa 19013 was served first class mail on the date of January, 19, 2017

SERVED:

REBECCA PROSPER, Esq. Assistant City Solicitor
CITY OF PHILADELPHIA LAW DEPARTMENT
ONE PARK, 1515 ARCH STREET, PHILADELPHIA Pa 19102
1595

Lucy V. Chin, In Rem Clerk
OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
Philadelphia, Pa 19106-5865

FILED

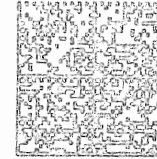
JAN 24 2017

KATE BARKMAN, Clerk
By _____ Dep. Clerk

Calvin Camps Pro Se
Calvin Camps, Pro Se
MC 1920
S.C.I. CHESTER
500 East 4th Street
Chester, Pa 19013

PENNSYLVANIA DEPARTMENT OF CORRECTIONS
SCI-CHESTER
500 EAST 4TH STREET
CHESTER, PA 19013

Name: Calvin Camps Wade
Number: MQ1920



U.S. POSTAGE PITNEY BOWES



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ATTN: Lucy V. Chin, Interim Clerk
OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
PHILADELPHIA, PA 19106-9999

re: Camps v. City of Philadelphia, et al.
CV-14-1498

X.S.M.S.
X-R.A.K.S.

19106X9999

